| - 1 |   |  |  |
|-----|---|--|--|
| 1   | Tanya E. Moore, SBN 206683<br>MISSION LAW FIRM, A.P.C.  |  |  |
| 2   | 332 North Second Street   |  |  |
| 3   | San Jose, California 95112<br>Telephone (408) 298-2000  |  |  |
| 4   | Facsimile (408) 298-6046<br>E-mail: service@mission.legal   |  |  |
| 5   | Attorneys for Plaintiff   |  |  |
| 6   | Francisca Moralez   |  |  |
| 7   |   |  |  |
| 8   | UNITED STATES DISTRICT COURT  |  |  |
| 9   | NORTHERN DISTRICT OF CALIFORNIA   |  |  |
| 10  |   |  |  |
| 11  | FRANCISCA MORALEZ,  | No. 3:17-cv-04466-WHA  |  |
| 12  | Plaintiff,  | STIPULATION TO EXTEND DEADLINE                               |  |
| 13  | vs.   | / TO COMPLETE JOINT SITE<br>/ INSPECTION REQUIRED BY GENERAL |  |
| 14  | HAYWARD MEDICAL MARKET, INC., et  | ORDER 56 AND TO CONTINUE CASE                                |  |
| 15  | al.,  | MANAGEMENT CONFERENCE;  [PROPOSED] ORDER AS MODIFIED         |  |
| 16  | Defendants.   |  |  |
| 17  |   | )<br>)   |  |
| 18  |   |  |  |
| 19  | WHEREAS, on August 7, 2017, the Court issued its Scheduling Order for Cases                         |  |  |
| 20  | Asserting Denial of Right of Access under Americans with Disabilities Act Title II & III (Dkt.      |  |  |
| 21  | 4), requiring that Plaintiff, Francisca Moralez ("Plaintiff"), and Defendants, Hayward Medical      |  |  |
| 22  | Market, Inc. and Rajneesh Salwan, Trustee of the Rajneesh Salwan Separate Property Trust            |  |  |
| 23  | ("Trustee") (Hayward Medical Market, Inc. and Trustee are collectively "Defendants," and            |  |  |
| 24  | together with Plaintiff, "the Parties"), conduct a joint site inspection of the subject property no |  |  |
| 25  | later than November 17, 2017;   |  |  |
| 26  | WHEREAS, due to scheduling conflic  | cts and Trustee's present endeavors to include               |  |
| 27  | insurance defense counsel in the matter, the Parties are unable to conduct the joint site           |  |  |
| 28  | inspection by the deadline, but have agreed to c  | onduct it on December 13, 2017 at 11:00 a.m.;                |  |
|     |   |  |  |

STIPULATION TO CONTINUE DEADLINE FOR JOINT SITE INSPECTION; [PROPOSED] ORDER

| 1  | WHEREAS, a Case Management Conference has been set for November 9, 2017 at                       |   |  |
|----|--|---|--|
| 2  | 11:00 a.m. (Dkt. 10);  |   |  |
| 3  | NOW, THEREFORE, the Parties stipulate to extend the deadline to conduct the joint                |   |  |
| 4  | site inspection to December 13, 2017, with all dates triggered by that deadline continued        |   |  |
| 5  | accordingly.   |   |  |
| 6  | The Parties additionally respectfully request a continuance the Case Management                  |   |  |
| 7  | Conference to a date on or after January 18, 2018 at the Court's convenience so that Trustee can |   |  |
| 8  |  |   |  |
| 9  | obtain the participation of its insurance defense counsel prior to the Conference.               |   |  |
|    | IT IS SO STIPULATED.   |   |  |
| 10 | Dated: November 2, 2017  | MISSION LAW FIRM, A.P.C.                        |  |
| 11 | ,  | ,   |  |
| 12 |  | /s/ Tanya E. Moore                              |  |
| 13 |  | Tanya E. Moore<br>Attorneys for Plaintiff,      |  |
| 14 |  | Francisca Moralez                               |  |
| 15 |  |   |  |
| 16 | Dated: November 2, 2017  | LAW OFFICES OF CHRISTIAN B. GREEN               |  |
| 17 |  |   |  |
| 18 |  | <u>/s/ John T. Hill</u><br>John T. Hill         |  |
| 19 |  | Attorneys for Defendant,                        |  |
|    |  | Hayward Medical Market, Inc.                    |  |
| 20 | D . 1 N . 1 . 2 . 2017   | WEGTON LAW CDOLLD                               |  |
| 21 | Dated: November 2, 2017  | WESTON LAW GROUP                                |  |
| 22 |  | /s/ Ian Bennett-Goldberg                        |  |
| 23 |  | Jonathan Black                                  |  |
| 24 |  | Ian Bennett-Goldberg Attorneys for Defendant,   |  |
| 25 |  | Rajneesh Salwan, Trustee of the Rajneesh Salwan |  |
| 26 |  | Separate Property Trust                         |  |
| 27 |  |   |  |
| 28 |  |   |  |
|    |  |   |  |

| 1   | ATTESTATION   |  |
|-----|---|--|
| 2 3 | Concurrence in the filing of this document has been obtained from each of the individual(s) whose electronic signature is attributed above. |  |
| 4   | /s/ Tanya E. Moore  |  |
| 5   | Tanya E. Moore  |  |
| 6   | Attorneys for Plaintiff Francisca Moralez   |  |
| 7   |   |  |
| 8   | <u>ORDER</u>  |  |
| 9   | The Parties having so stipulated and good cause appearing,  |  |
| 10  | IT IS HEREBY ORDERED that the deadline for the Parties to complete the joint site   |  |
| 11  | inspection is extended to December 13, 2017, with all dates triggered by that deadline  |  |
| 12  | continued accordingly.  |  |
| 13  | IT IS FURTHER ORDERED that the Case Management Conference is continued to   |  |
| 14  | December 7, 2018, at 11:00 a.m. in Courtroom 8, 19th Floor, 450 Golden Gate Avenue,   |  |
| 15  | San Francisco, before Judge William Alsup. A joint case management statement is due one   |  |
| 16  | week prior to the Case Management Conference.   |  |
| 17  |   |  |
| 18  | IT IS SO ORDERED.   |  |
| 19  | $l \sim M$  |  |
| 20  | Dated: November 6, 2017. HON. WILLIAM ALSUP   |  |
| 21  | United States District Judge  |  |
| 22  |   |  |
| 23  |   |  |
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